

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHARLES LINTZ, Individually and On : Civil Action No. 1:08-cv-03536-WHP
Behalf of All Others Similarly Situated, :
Plaintiff, :
vs. :
AGRIA CORPORATION, et al., :
Defendants. :
JOSHUA R. LeBLANC, Individually and On : Civil Action No. 1:08-cv-03886-WHP
Behalf of All Others Similarly Situated, :
Plaintiff, :
vs. :
AGRIA CORPORATION, et al., :
Defendants. :
SANDY LODERMEIER, Individually and On : Civil Action No. 1:08-cv-04456-UA
Behalf of All Others Similarly Situated, :
Plaintiff, :
vs. :
AGRIA CORPORATION, et al., :
Defendants.

x

NIJAT TONYAZ'S MOTION FOR CONSOLIDATION OF RELATED ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
SELECTION OF CO-LEAD COUNSEL

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Nijat Tonyaz will and hereby does move this Court on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY 10007, for an order: (1) consolidating related actions; (2) appointing Nijat Tonyaz as lead plaintiff pursuant to the Securities Act of 1933, as amended by the Private Securities Litigation Reform Act of 1995; and (3) approving his selection of Coughlin Stoia Geller Rudman & Robbins LLP and Holzer, Holzer & Fistel, LLC as co-lead counsel. In support of this motion, Mr. Tonyaz submits the accompanying memorandum of law and the Affidavit of David A. Rosenfeld.

DATED: June 10, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA JR.

s/ David A. Rosenfeld
DAVID A. ROSENFELD

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[Proposed] Co-Lead Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 10, 2008.

s/ David A. Rosenfeld
DAVID A. ROSENFELD

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Mailing Information for a Case 1:08-cv-03536-WHP

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Jason Samuel Cowart**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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